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February 16, 2024

VIA ECF

Honorable Brian R. Martinotti, U.S.D.J.
United States District Court
District of New Jersey
U.S. Post Office & Courthouse
2 Federal Square
Newark, NJ 07102

**Re: *In re: Insulin Pricing Litigation*, No. 2:23-md-03080-BRM-RLS
MDL No. 3080**

Dear Judge Martinotti:

In accordance with CMO #3, the parties submit the following weekly status report through the undersigned counsel:

1. The parties met and conferred regarding the ESI Protocol. Defendants will be providing their response to Plaintiffs' final proposal next week, at which time the parties' disputes will be crystallized. The parties will confer regarding a process to promptly bring disputed issues before the Court.
2. Defendants provided Plaintiffs with their final proposed draft of the Protective Order, along with a proposed briefing schedule for bringing disputed issues before the Court. The parties will confer further regarding the parties' submissions of competing proposals to the Court.
3. The parties continued to meet and confer regarding proposals for motion-to-dismiss briefing.

We thank the Court for its continued attention to this matter.

Hon. Brian R. Martinotti, U.S.D.J.

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Respectfully submitted,

/s/ James E. Cecchi

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Liaison Counsel for

Third-Party Payer Class Track

/s/ Joanne Cicala

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Liaison Counsel for

The State Attorney General Track

/s/ David R. Buchanan

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Liaison Counsel for

Self-Funded Payer Track

/s/ John D. Tortorella

John D. Tortorella

cc: Honorable Rukhsanah L. Singh, U.S.M.J. (via ECF)
All Counsel of Record (via ECF)